

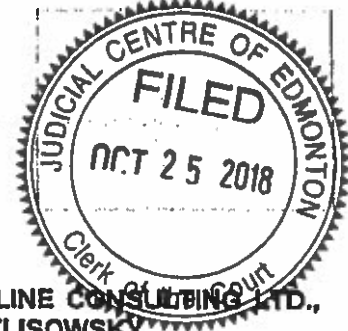
COURT FILE NUMBER 1803-09581

COURT Court of Queen's Bench of Alberta

JUDICIAL CENTRE Edmonton

PLAINTIFF BANK OF MONTREAL

DEFENDANTS LADACOR AMS LTD., NOMADS PIPELINE CONSULTING LTD.,
2367147 ONTARIO INC. and DONALD KLISOWSKY



DOCUMENT SEALING ORDER

ADDRESS FOR
SERVICE AND
CONTACT
INFORMATION
OF PARTY FILING
THIS DOCUMENT

Blake, Cassels & Graydon LLP
Barristers and Solicitors
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File No.: 99768/12

I hereby certify this to be a
true copy of the original.


for Clerk of the Court

DATE ON WHICH ORDER WAS PRONOUNCED: October 24, 2018

NAME OF JUDGE WHO MADE THIS ORDER: The Honourable Justice K.G. Nielsen

LOCATION OF HEARING: Edmonton, Alberta

UPON the application of Alvarez & Marsal Canada Inc. in its capacity as the receiver (the "Receiver") of the undertaking, property and assets of Ladacor AMS Ltd., Nomads Pipeline Consulting Ltd. and 2367147 Ontario Inc. (collectively, the "Debtors" and each a "Debtor") for an order sealing confidential appendix 1 (the "Confidential Appendix") and the un-redacted copy of the marketing agreement (the "Marketing Agreement") with Jones Lang LaSalle Real Estate Services Inc. ("JLL") attached as Appendix "B" to the Second Report of the Receiver dated October 16, 2018 (the "Second Report");

AND UPON HAVING READ the Second Report and such other material in the pleadings and proceedings as deemed necessary;

AND UPON HEARING the submissions of counsel for the Receiver and any other counsel in attendance at the Application;

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IT IS HEREBY ORDERED AND DECLARED THAT:**SERVICE**

1. Service of this Application is hereby abridged, if necessary, and the Application is properly returnable today and any requirement for service of the Application upon any party not served is hereby dispensed with.

SEALING

2. Division 4 of Part 6 of the *Alberta Rules of Court*, Alta Reg 124/2010 does not apply.
3. The Confidential Appendix and the Marketing Agreement contain confidential and commercially sensitive information, which if made publicly available could be used to the detriment of the parties and these receivership proceedings, and shall be sealed on the Court file, not form part of the public record, and not be available for public inspection unless and until the Receiver files a certificate with this Court confirming the completion of these receivership proceedings (the "Receiver's Completion Certificate") or further order by this Court, upon seven days' notice to all interested parties.
4. The Clerk of the Court shall file the Confidential Appendix and the Marketing Agreement in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY
ALVAREZ & MARSAL CANADA INC.

THE CONFIDENTIAL MATERIALS ARE SEALED UNTIL ALVAREZ &
MARSAL CANADA INC. FILES THE RECEIVER'S COMPLETION
CERTIFICATE OR FURTHER ORDER PURSUANT TO THE SEALING
ORDER ISSUED BY THE HONOURABLE JUSTICE K.G. NIELSON ON
OCTOBER 24, 2018.

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5. Leave is hereby granted to any person, entity or party affected by this Order to apply to this Court for a further Order vacating, substituting, modifying or varying the terms of this Order, with such application to be brought on notice to the Receiver and any other affected party in accordance with the *Alberta Rules of Court*, Alta Reg 124/2010 and this Order.



J.C.Q.B.A.

OCTOBER 25, 2018

APPROVED AS TO FORM AND CONTENT THIS 24 DAY OF OCTOBER 2018:

DENTONS CANADA LLP



Counsel for the Bank of Montreal